

NORTH WARWICKSHIRE BOROUGH COUNCIL LOCAL PLAN EXAMINATION

Statement prepared by GL Hearn on behalf of Severn Trent Water Matter 8 – Viability and Delivery

1. This position statement is prepared on behalf of Severn Trent Water by GL Hearn and considers specifically the land interests of Severn Trent (ST) located at Coleshill STW, which have previously been the subject of submissions relating to the review of the NWBC Local Plan (ref: SLP442). This statement should be considered in the context of the Document Ref: INSP5.
2. GL Hearn put forward the following comments in relation to the Inspector's questions/points raised;

8.1 Is there appropriate evidence regarding viability, market conditions, and infrastructure funding to indicate that the level of development that the LP intends to enable would be delivered in practice?

3. No, the available evidence does not provide a sufficiently robust assessment of viability and market conditions or an appropriate level of certainty that funding for 'critical' or 'necessary' infrastructure is, or will be, secured.
4. NPPG recommends plan-making authorities:

“use available evidence of infrastructure requirements to prepare an Infrastructure Funding Statement. This should set out the anticipated funding from developer contributions, and the choices local authorities have made about how these contributions will be used. At examination this can be used to demonstrate the delivery of infrastructure throughout the plan-period.

Authorities will also need to ensure that policies setting out contributions expected from development do not undermine delivery of the plan. Plan viability assessment should be carried out in accordance with guidance.

Where plans are looking to plan for longer term growth through new settlements, or significant extensions to existing villages and towns, it is recognised that there may not be certainty and/or the funding secured for necessary strategic infrastructure at the time the plan is produced. In these circumstances strategic policy-making authorities will be expected to demonstrate that there is a reasonable prospect that the proposals can be developed within the timescales envisaged.

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5. The Council's viability assessment of the LP is provided across two viability assessment documents (NWBC13 & NWBC14, September 2018), which together provide an update to an earlier March 2014 Viability Assessment (Document ref CD8/22). Alongside these documents is the Council's Infrastructure Delivery Plan (CD0/4, March 2018).
6. The IDP identifies a series of transport infrastructure requirements that are either “critical” or “necessary” to support the development intentions at Atherstone, Poleswoth and Dordon. The IDP

identifies that funding to deliver this transport infrastructure provision will be drawn from a variety of sources, including “*Developer contributions, LTP funding, HE funding, Single Local Growth Fund, RIS*”, but provides no certainty that the necessary funding is secured or even committed and additionally recognises that “*other*” funding from undefined sources will also “*need to be explored*”.

7. There is an obvious risk therefore that the delivery of employment allocations, which are intended to provide the quantum of employment land necessary for the plan to deliver 100ha of additional employment land in the period 2011 to 2033, may not happen or may not be supported by infrastructure “*critical*” and/or “*necessary*” to the delivery of the Council’s overall intentions for the distribution of development set out by the LP.
8. Additionally, the IDP only assesses infrastructure requirements in line with the minimum (constrained) quantum and distribution of development currently proposed by the LP. If additional employment land allocation(s) is required to ensure the objectively assessed need for employment development is met (see STW statement for Matter 5) it may put further pressure on the strategic infrastructure provision and its (uncertain) funding, unless the additional employment allocation(s) is delivered at a location(s) that is already served by an appropriate highway network and other strategic infrastructure.

8.3 What is the relevance of paragraph 2.14 of the 2016 Employment Land Review [CD8/7] which sets out ‘there are evident questions regarding the scale of development which can realistically be delivered’?

9. Chapter 3 of the Employment Land Review (ELR) (CD8/7) summaries existing employment land evidence and issues, including drawing on evidence from the West Midlands Strategic Employment Sites Study (WMSESS) (Document ref: AD25) which recognises continuing market demand from industrial and distribution sectors, for sites within the M6/M6Toll/M42 corridor (within the WMSESS ‘Area A’) but a constrained supply of land to satisfy that demand and potential risks to the assurance of longer-term supply.
10. Chapter 4 of the ELR recognises the locational attractiveness of Coleshill within the M6/M6Toll/M42 corridor for logistics/distribution and manufacturing floorspace, subsequently evidenced at paragraph 5.21 of the ELR with recognition that Coleshill saw the highest level of industrial take-up in the Coventry and Warwickshire sub-region between 2010 and 2015. Additionally paragraph 4.12 the ELR advises that growth of the logistics/distribution and manufacturing sectors (and the construction sector) is “*likely to drive demand for future employment floorspace in North Warwickshire*”.
11. Whilst the market evidence therefore points to the Coleshill M6/M42 area as the preferred location for employment floorspace needs, the LP steers new employment allocations elsewhere.
12. Our submitted statement in respect of Matter 5 (Employment Needs and Requirements) challenges the soundness of the applied approach of the Council to the allocation of employment land and the fact that it does not meet the objectively assessed need, particularly in the context of the obligation on the Council to plan proactively to meet the development needs of business, such as under Paragraphs 20 and 157 of NPPF2012. In that regard, the Council’s applied approach ignores the potential opportunity for Coleshill to contribute further to meeting employment demand (additional to that currently provided by the existing Coleshill and Hams Hall Industrial Estates) despite evidence demonstrating its locational attractiveness to the market and existing infrastructure available to support it.
13. By taking a blinkered view of employment need to 2031 to the exclusion of sites outside of existing employment areas and within the Green Belt, the Council has not considered how the allocation of additional employment land in a sustainable location and within the ‘market preferred’ Coleshill

M6/M42 area, could assist in widening the employment base, respond better to market signals and market demand, give greater certainty of delivery of employment floorspace, and would align with the Sustainability Appraisal Option OUT1. And how it could do so without reliance on “*critical*” - but currently unfunded - new strategic infrastructure provision.

GL Hearn, 5 October 2018